

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
)
Siyuan YE) Case No. 2:23-mj-499
)
)
)
)
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2022 through August 2023 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1028(a)(7)	Identity Fraud
18 U.S.C. § 1341	Mail Fraud

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

JEFFREY R LANDTHORN
Digitally signed by JEFFREY R
LANDTHORN
Date: 2023.08.30 16:05:17 -04'00'

Complainant's signature

Jeffrey R. Landthorn, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: August 30, 2023

Columbus, OH

City and state: _____

Kimberly A. Jolson

United States Magistrate Judge



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jeffrey Landthorn (your affiant), being duly sworn, depose and state as follows:

I. INTRODUCTION

1. Your affiant is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (HSI) currently assigned to the Columbus, Ohio office. Your affiant obtained a Bachelor of Science in Business Administration (Finance) from the Ohio State University in 2001 and completed both the Federal Criminal Investigator Training Program (CITP) and the ICE Special Agent Training (ICESAT) Academy at the Federal Law Enforcement Training Center (FLETC) in Brunswick, Georgia in 2004. During CITP and ICESAT, your affiant was instructed in all phases of criminal investigation such as: Criminal Law, Search and Seizure, Field Enforcement Techniques, Firearms Proficiency, Interviewing, and Evidence. During his nineteen-year career as a Special Agent, your affiant has conducted and participated in myriad investigations involving numerous different sections of the U.S. Criminal Code. More specifically, your affiant has investigated various types of fraud schemes, including identity fraud, benefit fraud, and financial fraud.
2. Your affiant is submitting this affidavit in support of a Criminal Complaint authorizing the arrest of the following individual for violations of 18 U.S.C. § 1028(a)(7) and § 1341:
 - a. Siyuan YE, DOB: 11/14/1999, who resides at 265 E. State Street Apartment 411 Columbus, Ohio 43215, and is currently incarcerated at the Franklin County Corrections Center at 2460 Jackson Pike Columbus, Ohio 43223.
3. Your affiant's statements in this affidavit are based on your affiant's personal knowledge and experience, a review of documents and databases, information received from subpoenas, as well as information received from Investigators with the Ohio Bureau of Motor Vehicles (BMV), Investigators with the Ohio Casino Control Commission, Officers with the Ohio State University Police Department, as well as Officers with the Mayfield Heights, Ohio Police Department involved in this investigation. Since this affidavit is being submitted for the limited purpose of securing a Criminal Complaint and an arrest warrant, your affiant did not include each and every fact known concerning this investigation. However, your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause.
4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1028(a)(7) (Identity Fraud), and § 1341 (Mail Fraud), have been committed by YE.

II. INVESTIGATION AND PROBABLE CAUSE

5. Your affiant began this investigation on April 21, 2023, after receiving information from the Ohio BMV Investigations Section regarding the identity theft of Victim 1 (V1).
6. On April 19, 2023, V1, who resides in Mayfield Heights, Ohio, filed a report at the Mayfield Heights Police Department (MHPD) stating that he received at his residence, via U.S. mail, a Micro Center Mastercard, issued by Wells Fargo bank. V1 stated that he never applied for such a card, that he had contacted the Wells Fargo fraud department to tell them the same, and that Wells Fargo told him the credit card was already at its credit limit.
7. MHPD began looking further into the matter and found, through inquiries with Micro Center employees, the following:
 - a. On April 11, 2023, at the Micro Center store in Columbus, Ohio, an individual, later identified on May 3, 2023, as YE, applied in-person for the Wells Fargo Micro Center credit card in the name of V1 and was approved for a line of credit up to \$8,400. As proof of identification for the credit card, YE provided an Ohio driver's license (number ending in x4333), with the biographical information and likeness of V1.
 - b. On April 11, 13, and 14, 2023, at the Columbus, Ohio Micro Center store, the Micro Center credit card was used for in-store purchases of some small food items, plus the following:

DATE OF PURCHASE	ITEM	COST
April 11, 2023	Zotac Graphics Card, <i>serial number 9288-2N688-300Z8</i>	\$ 1,299.99
April 11, 2023	MSI Graphics Card, <i>serial number 602-V511-020B2302001085</i>	\$ 1,224.99
April 13, 2023	Dell Laptop, <i>serial number DH6JCK3</i>	\$ 1,814.96
April 13, 2023	Apple Watch Ultra, <i>serial number SK59Y9JGHGQ</i>	\$ 692.96
April 14, 2023	Asus Graphics Card, <i>serial number R3YVMX01B976953</i>	\$ 2,099.99
April 14, 2023	Apple MacBook Pro Laptop, <i>model number MUHN2LL/A</i>	\$ 629.99
TOTAL OF ELECTRONICS PURCHASED		\$ 7,762.88

- c. Micro Center cash register security camera footage from April 11, 2023, shows YE wearing a black and white letter jacket (black body, white sleeves, with black and white stripes on the collar and cuffs) walking up to and standing at the checkout.
8. MHPD made inquiries with Ohio BMV Investigations regarding Ohio license number x4333 used at Micro Center, and the following was revealed:

- a. On March 31, 2023, on the State of Ohio “OH|ID” website (ohid.ohio.gov), where individuals can create an account to use for several different state websites for identification verification purposes and to assist in obtaining state benefits, to include facilitating Ohio BMV transactions, an OH|ID account (account number 76605769) was created in V1’s identity. The creation of OH|ID accounts requires multi-step identity verification, with questions regarding closely held information, such as the account holder’s current and past residences, telephone numbers, loans, etc. The email address “luyangxiao1@mail.com” and a mailing address of 120 E. 13th Avenue, Apartment K Columbus, Ohio 43201 were added to the account. The account creation activity took place from Internet Protocol (IP) address 76.221.153.246.
 - b. On April 2, 2023, OH|ID account number 76605769 was accessed online, and the mailing address for V1 was changed to 120 E. 13th Avenue Apartment L Columbus, Ohio 43201. The account modification activity took place from IP address 76.221.153.246.
 - c. On April 2, 2023, OH|ID account number 76605769 was accessed online, and a reprint of V1’s driver’s license was ordered on from IP address 76.221.153.246 and was paid for (\$20.25) with debit card number x8067. An open-source search subsequently revealed that this is a debit Mastercard connected to a Capital One bank account.
 - d. On April 10, 2023, V1’s replacement driver’s license (number ending in x4333) was mailed from the Ohio BMV to 120 E. 13th Avenue Apartment L Columbus, Ohio 43201.
9. On April 28, 2023, MHPD was made aware from V1 that a 2018 Suzuki motorcycle was purchased by an individual at Iron Pony Motorsports in Westerville, Ohio using V1’s identity. MHPD immediately inquired with Iron Pony Motorsports and obtained the following information:
 - a. Purchase documents for the 2018 Suzuki GSX-S750 motorcycle, all in the identity of V1, with the total being \$8,952.84 (including sales tax, title, and other fees).
 - b. Documents from CommunityWide Federal Credit Union for financing the motorcycle purchase, all in V1’s identity.
 - c. April 15, 2023 security camera footage from 5:19 PM showing an individual, later identified on May 3, 2023 as YE, sitting at a desk while an employee completes the motorcycle purchase. YE is wearing glasses, a black leather jacket with button-snap epaulettes on the shoulders and grey hood, and black shorts.
 - d. April 15, 2023 security camera footage showing YE, wearing the same clothing as above, at the front of the store purchasing an HJC motorcycle helmet.

- e. A photo of the very same model helmet YE purchased. The helmet is mostly black with several blue stripes on the top and sides and has a clear flip-down visor.

10. On April 29, 2023, AT&T responded to a subpoena previously sent by MHPD that requested identifying information associated with IP address 76.221.153.246, on April 2, 2023, at the time of the purchase of V1's driver's license reprint. The response stated that Jessica Rosco is currently and has been the subscriber without interruption since October 13, 2022, and that the service and billing address is 120 E. 13th Avenue Unit J Columbus, Ohio 43201.

11. On May 3, 2023, Capital One responded to a request previously sent by MHPD for information regarding Capital One debit Mastercard x8067. The response revealed the following:

- a. The debit card was attached to a Capital One checking account with an account number ending in x5741, for which Siyuan YE (date of birth in 1999, social security number ending in x2434) was the primary account holder.
- b. YE opened the account in October of 2020, and in January of 2022, without authorization, added a Gahanna, Ohio man as a joint account holder.
- c. In January of 2022, the man filed a police report with the Gahanna, Ohio Police Department and notified Capital One, stating that he did not know YE and that never authorized being added to the account. He was removed by Capital One as a user of the account, but the account stayed open after that, with YE as the sole user of the account.
- d. From November 11, 2022 to April 13, 2023, there were 47 Zelle payments from Jessica Rosco to YE totaling \$3,060.50, and there were 15 Zelle payments from YE to Rosco totaling \$678.
- e. Security camera footage from the Capital One ATM at 167 Easton Town Center Columbus, Ohio 43219 on April 15, 2023, from approximately 7:04 PM to 7:06 PM, showing an individual, later identified on May 3, 2023 as YE, making an \$800 cash deposit. In the photos, YE is wearing the same clothing (glasses, black leather jacket with grey hood, black shorts) that he wore a few hours prior at Iron Pony Motorsports, when he purchased the Suzuki motorcycle. Also, in the ATM photos, YE is carrying the same black and blue HJC helmet he purchased a few hours earlier at Iron Pony Motorsports.
- f. Security camera footage from the Capital One ATM at 167 Easton Town Center Columbus, Ohio 43219 on April 20, 2023, from approximately 5:13 PM to 5:16 PM, showing YE making a \$2,600 cash deposit. In the photos, YE is carrying the same aforementioned black and blue HJC helmet.

12. On May 3, 2023, your affiant queried YE in Ohio Attorney General's Law Enforcement Gateway (OHLEG) database and found three different photographs of YE, from YE's expired Ohio driver's license (number ending in x4811). YE and the individuals in all of the aforementioned Micro Center, Iron Pony Motorsports, and Capital One ATM security camera footage appear to be the same person.
13. On June 20, 2023, your affiant conducted surveillance at 120 E. 13th Avenue Columbus, Ohio 43201. Your affiant noted the following regarding the external mailboxes:
 - a. The mailboxes for the apartment building are on the outside pillared entryway, on the left wall.
 - b. There are 24 tall, rectangular metal mailboxes, in four banks of six, each with their own individual key-access lock.
 - c. The mailboxes have small white labels with black writing on them bearing apartment letters (A, B, C, and so on, with no "I" or "O")
 - d. Each bank of six boxes has one master keylock for U.S. Postal Service employees to use when distributing mail. The employee simply pulls down, and the bank of six boxes, which is hinged at the bottom, opens out.
 - e. On this day, your affiant observed that five of the 24 individual boxes were unsecured and partially open with mail visible inside, including K and L, and that one of the four banks had no master keylock and pulled down with minimal effort, exposing insides of the six mailboxes it contained.
14. On June 21, 2023, your affiant queried the Ohio Attorney General's Law Enforcement Gateway (OHLEG) database and found that Jessica Rosco does not have a vehicle registered in the state of Ohio.
15. On June 21, 2023, your affiant discovered through an OHLEG search that Jessica Rosco's mother has several vehicles registered in the state of Ohio, one of which is a black 2013 Chevrolet Sonic (registration number GXL-4789).
16. On June 25, 2023, AT&T responded to a grand jury subpoena previously sent by your affiant that requested subscriber information for IP address 76.221.153.246. The response stated that as of that date, Jessica Rosco was still the subscriber and that the service and billing address were still 120 E. 13th Avenue Unit J Columbus, Ohio 43201.
17. On July 6, 2023, your affiant spoke with the Assistant General Manager (AGM) at Hometeam Properties, the owner of 120 E. 13th Avenue. The AGM stated that Jessica Rosco is the current sole listed lessee/occupant for apartment J, that the lease began on August 19, 2022, and that the lease expires on July 31, 2023. The AGM also stated that YE is not listed as a registered lessee or occupant of any apartment in the building at 120 E. 13th Avenue.

18. On July 6, 2023, while conducting surveillance at 120 E. 13th Avenue Columbus, Ohio 43201, at approximately 9:00 AM, your affiant observed the aforementioned black Chevrolet Sonic (Ohio registration number GXL-4789) parked in a parking lot across the street from 120 E. 13th Avenue.
19. On July 6, 2023, at approximately 3:15 PM, your affiant observed YE exit the front of the apartment building. YE was wearing the same black and white letter jacket (black body, white sleeves, with black and white stripes on the collar and cuffs) he was seen wearing on April 11, 2023 in the aforementioned Micro Center security camera footage. YE walked across 13th Avenue, entered the black Chevy Sonic (GXL-4789), drove the vehicle around the block, and parked it in front of 120 E. 13th Avenue. YE exited the vehicle and entered the front of 120 E. 13th Avenue. Approximately 10 minutes later, YE exited the front of the apartment building, entered the black Chevy Sonic, and drove away, northbound on Indianola Avenue.
20. On July 7, 2023, while conducting surveillance at 120 E. 13th Avenue Columbus, Ohio 43201, at approximately 8:40 AM, your affiant observed Jessica Rosco, driving the same black Chevy Sonic (GXL-4789), arrive at the parking lot across the street from 120 E. 13th Avenue. Rosco exited the vehicle, walked across the street, and entered the front of 120 E. 13th Avenue.
21. On July 12, 2023, your affiant reviewed the Ohio State University Police Department's (OSUPD) report relating to YE's April 9, 2022 arrest for receiving stolen property. During an OSUPD search of YE's person pursuant to that arrest, a small wallet with six gold keys attached to the zipper was found. The keys had "U.S.P.S. do not duplicate" engraved on them.
22. On July 14, 2023, your affiant received the following from Iron Pony Motorsports:
 - a. A photograph of V1's Ohio driver's license (number ending in x4333). YE provided this photograph to Iron Pony Motorsports as proof of his identity when he applied through their website for financing, a few days prior the April 15, 2023 motorcycle purchase.
 - b. An Iron Pony Motorsports address confirmation form, which was filled out by or for YE on April 15, 2023 at the time of purchase. The form allows one of two check-box options. The first states, "I confirm the address listed on the buyer's order is my mailing address." The second box, which is checked, states, "I confirm the address listed on the buyer's order is NOT my mailing address." Below that box, there is a section to fill in, which states, "My correct mailing address is:" Hand-written in the space below that is "120 E. 13th Ave. Apt L Columbus, Ohio 43201." The address YE listed on the buyer's order on April 15, 2023 is V1's actual address.

23. On July 18, 2023, your affiant interviewed another identity theft victim (V2) who is familiar with YE. During the interview, V2 stated that in August of 2022, YE was arrested by the Ohio State University Police Department, and that following YE's arrest, a woman he knew to be YE's girlfriend posted a video to YE's Instagram account. V2 had a copy of this video on his phone and showed it to your affiant. In the video, a woman your affiant immediately recognized as Jessica Rosco used five different "selfie" photos of herself, along with text as the video progresses. One of her narratives is as follows: "Any other girls he seeing?? Me and another just found out we were being two timed by him..."

24. On July 21, 2023, your affiant interviewed V1 telephonically. V1 stated the following:

- a. His last interaction with the Ohio BMV was in August of 2022, when he renewed his vehicle registration directly through the BMV website (which did not require an OH|ID account).
- b. He has never created or used an OH|ID account.
- c. He never ordered a reprint of his Ohio driver's license for himself on April 2, 2023.
- d. He has never lived in Columbus, Ohio, nor has he ever maintained a mailing address in Columbus, Ohio.
- e. He has never used the email address luyangxiao1@mail.com.
- f. He never purchased any items at the Columbus, Ohio Micro Center store in April 2023.
- g. He never purchased a 2018 Suzuki motorcycle in April 2023.

25. On July 25, 2023, your affiant again spoke with the AGM at Hometeam Properties, the owner of 120 E. 13th Avenue. Your affiant inquired about the current tenants of apartments K and L (two apartments for which YE has previously used the addresses to receive mail). The AGM provided the lessee names for apartments K and L, neither of which have ever been used by YE to the best of your affiant's knowledge. Your affiant also provided the AGM with V1's and V2's names, to see if YE had possibly leased any apartment within 120 E. 13th using their identities. The AGM found no such record in their system.

26. On July 25, 2023, your affiant observed a silver Triumph Street Triple 765 R motorcycle parked on the street in front of 120 E. 13th Avenue. The motorcycle was bearing Ohio temporary registration 4W5186.

27. On July 25, 2023, your affiant received from the Ohio BMV two "Flock" license plate reader (LPR) images captured by static cameras in the Ohio State University campus

area. The images were a result of an Ohio BMV Flock query for the temporary Ohio registration (4W5186) found on the Triumph motorcycle. The images show an individual riding the Triumph wearing a black leather jacket with grey hood and a black and blue helmet, both very similar to the jacket and helmet previously worn by YE.

28. On July 25, 2023, your affiant learned from the Ohio BMV that the Triumph motorcycle (model Street Triple 765 R) was purchased on July 14, 2023 from Triumph Cleveland, and that the owner and registrant is listed as Victim 3 (V3), with an address of 2875 Olentangy River Road Apartment 364 Columbus, Ohio 43202 (AUTHOR'S NOTE: The address is known to your affiant as an actual former residence of YE, with YE being one of the two lessees).
29. V3 is previously known to your affiant as part of this investigation:
 - a. On May 3, 2023, the Ohio BMV account for V3 was accessed online from IP address 76.221.153.246, which was later found to be subscribed to by Rosco at 120 E. 13th Avenue, Apartment J Columbus, Ohio 43201.
 - b. On May 5, 2023, on the State of Ohio "OH|ID" website (ohid.ohio.gov), an OH|ID account (account number 72816028) was created in V3's identity. The creation of OH|ID accounts requires multi-step identity verification, with questions regarding closely held information, such as the account holder's current and past residences, telephone numbers, loans, etc. The email address "richforeverchou@gmail.com" was added to the account. The account creation activity took place from IP address 24.52.91.178.
 - c. On May 7, 2023, OH|ID account number 72816028 was accessed online, and a mailing address of 120 E. 13th Avenue, Apartment C Columbus, Ohio 43201 was added for V3. The account modification activity took place from IP address 24.52.91.178.
 - d. On May 14, 2023, OH|ID account number 72816028 was accessed online, and a reprint of V3's driver's license was ordered from IP address 24.52.91.178 and was paid for (\$27.75) with credit card number x6761. The email address "siyuanci88@outlook.com" was also added to the account.
 - e. On May 23, 2023, via FedEx (tracking number 7722 1295 2499), V3's replacement driver's license (number ending in x5680) was delivered to 120 E. 13th Avenue Apartment C Columbus, Ohio 43201.
 - f. On June 12, 2023, your affiant learned from the State of Ohio Casino Control Commission that IP address 24.52.91.178 is subscribed to by the Hollywood Casino in Columbus, Ohio, and is used by the casino for guests to be able to use Wi-Fi free of charge. Your affiant also learned that YE is a frequent guest of Hollywood Casino, gambling there multiple times per week.

- g. On June 20, 2023, while present in the public-accessible front porch area of 120 E. 13th Avenue your affiant observed a pile of discarded mail on the ground below the mailbox. In that pile, your affiant observed:
 - An opened FedEx envelope addressed to V3 at 120 E. 13th Avenue Apartment C Columbus, Ohio 43201. The tracking number on the envelope label was 7722 1295 2499.
 - A white letter-size envelope with clear address windows and black patterned security print on the inside. The envelope had been torn open on the right side.
 - A tri-folded piece of paper from the Ohio BMV addressed to V3 at 120 E. 13th Avenue Apartment C Columbus, Ohio 43201. In the middle of the page, the paper was partially torn, with a clear adhesive strip that likely affixed V3's driver's license to the paper.
- h. On July 3, 2023, an Ohio BMV Investigator interviewed V3, who stated the following:
 - He did not order a reprint of his Ohio driver's license on May 14, 2023.
 - His only connection to the Columbus, Ohio area is when he attended The Ohio State University over 10 years ago.
 - Since then, he has not used or maintained a Columbus, Ohio address of any kind.
 - He has never used the email "siyuanci88@outlook.com."
30. On or about July 27, 2023, your affiant obtained a warrant to search 120 E. 13th Avenue Apartment J, Columbus, Ohio 43201, and a warrant to search YE's person if he were present at that address. The warrants were signed by U.S. Magistrate Judge Kimberly A. Jolson. Before executing the warrants, however, your affiant learned that YE had moved out of the residence at that address. Accordingly, the warrants were not executed.
31. On July 27, 2023, your affiant observed the aforementioned black Chevrolet Sonic (Ohio registration number GXL-4789) and the aforementioned Triumph Street Triple 765 R motorcycle parked directly in front of 265 E. State Street Columbus, Ohio 43215. That is the address for "Xander on State" a six-story apartment building. Your affiant spoke with the Property Manager (PM) for Xander on State, inquiring if YE and/or Rosco were leasing an apartment. The PM did not recognize either name, but when your affiant showed her a photograph of YE, she and another office employee immediately recognized YE, but both only know him by the name of V3.
32. The PM stated that YE (known to her as V3) is the sole lessee of apartment 411, a studio apartment, and moved in on July 22, 2023. She also stated that a female acquaintance of

YE (described by the PM as young, short, fair-skinned with strawberry blonde hair and glasses, and known to her only as YE's girlfriend "Jessica") has been seen in and around the apartment and building, but that the young woman is not listed as a lessee or an occupant.

33. The PM stated that Internet service is provided to each apartment by Xander on State for a fee, and each apartment is assigned its own internal IP address. The internal IP address for apartment 411 is 192.168.161.61.
34. While your affiant was in the Xander on State PM's office, he observed YE exit the front of the building, walk to, and mount the aforementioned Triumph motorcycle for a moment, then re-enter the building.
35. The PM provided your affiant information from the YE's apartment file, which included the following:
 - a. Summary sheet showing details of the submission of the rental application, with an individual using V3's name, and an email address of "richforeverchou@gmail.com," the document having been started on June 9, 2023 at 11:21 PM, from IP address 24.52.91.178 (Hollywood Casino IP address).
 - b. Non-dated employment offer letter from The Guitar Center Company, addressed to V3 at 2875 Olentangy River Road Columbus, Ohio 43202. The offer is for an expert music teacher position in Westerville, Ohio.
 - c. Application summary dated June 14, 2023, stating past rental verification could not be completed because YE lived with his girlfriend and was not on her lease.
 - d. Rental report dated June 14, 2023, listing his former address as 120 E. 13th Avenue Columbus, Ohio 43201.
 - e. Rental agreement dated July 18, 2023, listing V3 as the lessee for apartment 411, from July 22, 2023 to July 21, 2024. At the bottom of each page are V3's initials. The rental agreement was signed and submitted to the PM electronically, online, via Xander on State's online application system, on July 20, 2023.
 - f. Summary sheet showing details of the submission of the rental agreement, with an individual using V3's name, and an email address of "richforeverchou@gmail.com," starting the document on July 20, 2023 at 4:02 PM, from IP address 76.221.153.246 (120 E. 13th Avenue Apartment J IP address).
 - g. Move-in checklist dated June 27, 2023 with a signature in the name of V3 and a phone number for V3 listed as 614-963-2450 (AUTHOR'S NOTE: This phone number is previously known to your affiant as the phone number YE provided to

Geico Insurance when he applied to insure the aforementioned 2018 Suzuki GSX-S750 motorcycle he purchased using V1's identity).

- h. Liberty Mutual renter's insurance policy in the name of V3, with 120 E. 13th Avenue Columbus, Ohio 43201 listed as the mailing address, and 265 E. State Street Columbus, Ohio 43215 listed as the insured location.
- i. Photograph of V3's Ohio driver's license (number ending in x5680), with V3's likeness and actual address, issued on May 14, 2023.

36. On August 1, 2023, your affiant received from the Ohio BMV the following documents relating to the purchase of the aforementioned Triumph Street Triple 765 R motorcycle:

- a. Purchase documents for the motorcycle, with the total being \$12,365.50 (including sales tax, title, and other fees). The documents are in the identity of V3, with an address of 2875 Olentangy River Road Apartment 364 Columbus, Ohio 43202, and an email address of "richforeverchou@gmail.com."
- b. Documents from Freedom Road Financial for financing the motorcycle purchase, all in V3's identity.
- c. Bank of America checking account (x5616) statement in V3's name, with an address of 2875 Olentangy River Road, Apartment 364 Columbus, Ohio 43202 (AUTHOR'S NOTE: Your affiant contacted Bank of America and was told that no such account exists).
- d. Page one of the rental agreement for 2875 Olentangy River Road, Apartment 364 Columbus, Ohio 43202, for the period of June 1, 2022 through July 31, 2023. The agreement lists V3 and another individual as the two lessees for the apartment (AUTHOR'S NOTE: This document is known to your affiant, as it appears to be the very same page one of the real rental agreement YE entered into for that address in 2022 but with V3's name substituted in place of YE's).
- e. Photograph of V3's Ohio driver's license (number ending in x5680), with V3's likeness and actual address, issued on May 14, 2023.

37. On August 2, 2023, your affiant received from the Ohio BMV the following video footage and photographs from the Triumph Cleveland dealership captured on July 14, 2023:

- a. Internal security camera footage showing YE speaking with a dealership employee. YE, who has a blue surgical mask on his face, is wearing the same black leather jacket with button-snap epaulettes on the shoulders and grey hood that he was seen wearing on April 15, 2023. YE is also carrying the same black and blue HJC motorcycle helmet he purchased at Iron Pony Motorsports on April 15, 2023, and was seen with in subsequent security camera footage.

- b. External security camera footage showing YE speaking with a dealership employee outside of the front entrance, next to the Triumph motorcycle. The employee appears to explain some things about the motorcycle, takes the picture mentioned below, and then YE gets on the motorcycle and rides away.
- c. Photographs taken by a dealership employee showing YE posing with the Triumph motorcycle in front of the dealership, now wearing the aforementioned black and blue helmet.

38. On August 4, 2023, your affiant learned from the U.S. Postal Service that on July 31, 2023, Rosco filed a change of address from 120 E. 13th Avenue, Apartment J Columbus, Ohio 43201 to 265 E. State Street, Apartment 411 Columbus, Ohio 43215.

39. On August 10, 2023, your affiant observed YE and Rosco exit the front door of the Xander on State building, enter the aforementioned black Chevrolet Sonic and drive away.

40. On August 14, 2023, your affiant learned the following from the PM at Xander on State:

- a. The internet service is provided to the building then distributed to each apartment by Xander on State.
- b. The public-facing IP address range assigned to Xander on State by Spectrum is 70.61.237.178 to 70.61.237.190.
- c. The 13 IP addresses within this range would be the IP addresses of record associated with internet activity being conducted by tenants within the building that utilized the Xander on State-provided internet service.

41. On August 21, 2023, at approximately 9:27 AM, your affiant observed the Triumph motorcycle parked on the street in front of the Xander on State building.

42. On August 22, 2023, at approximately 7:45 AM, your affiant observed the black Chevrolet Sonic parked in front of the Xander on State building. At 7:51 AM, your affiant observed YE riding on the Triumph motorcycle, driving east on State Street. YE pulled into a parking space in front of the Xander on State building, dismounted the motorcycle, and walked toward the front entrance of the building. YE was not wearing a helmet but was wearing the same aforementioned black leather jacket with grey hood.

43. On August 22, 2023, your affiant received the following information from the Ohio BMV:

- a. On August 21, 2023, at 11:02 PM, OH|ID account number 75583550, associated with Victim 4 (V4) (previously known to your affiant) was accessed online, and the mailing address for V4 was changed to 120 E. 13th Avenue, Apartment K

Columbus, Ohio 43201. The account modification activity took place from IP address 70.61.237.181 (Xander on State IP address).

- b. On August 21, 2023, at 11:51 PM, on the State of Ohio “OH|ID” website (ohid.ohio.gov), an OH|ID account (account number 77824424) was created in the identity of Victim 5 (V5) (who is previously known to your affiant). The email address “k2947337@gmail.com” was added to V5’s account. The account creation activity took place from IP address 70.61.237.181 (Xander on State IP address).
- c. On August 22, 2023, at 1:07 AM, on the State of Ohio “OH|ID” website (ohid.ohio.gov), an OH|ID account (account number 76815742) was created in the identity of Victim 6 (V6) (who is not previously known to your affiant). The email address “brinzhu@gmail.com” and mailing address of 265 E. State Street Apartment 411 Columbus, Ohio 43215 were added to the account. The account creation activity took place from IP address 24.52.91.178 (Hollywood Casino IP address).

44. On August 22, 2023, your affiant learned from the State of Ohio Casino Control Commission that on August 22, 2023, at the Hollywood Casino in Columbus, Ohio, YE’s Hollywood Casino player’s card was first presented and scanned at 12:39 AM and was presented and scanned for the last time at 5:32 AM.

45. V4 is previously known to your affiant as part of this investigation:

- a. On March 12, 2023, on the State of Ohio “OH|ID” website (ohid.ohio.gov), an OH|ID account (account number 75583550) was created in V4’s identity. The email address “ericpppei@outlook.com” was added to the account. The account creation activity took place from IP address 76.221.153.246 (120 E. 13th Avenue Apartment J IP address).
- b. Between March 25, 2023 and July 9, 2023, OH|ID account number 75583550 was accessed online multiple times from IP addresses 76.221.153.246 (120 E. 13th Avenue Apartment J IP address) and 24.52.91.178 (Hollywood Casino IP address). In a few of these instances, a mailing address of 120 E. 13th Avenue, Apartment C Columbus, Ohio 43201 was added, and then changed to 120 E. 13th Avenue, Apartment E Columbus, Ohio 43201.

46. V5 is previously known to your affiant as part of this investigation:

- a. On May 2, 2023, the Ohio BMV account for V5 was accessed online from IP address 76.221.153.246 (120 E. 13th Avenue Apartment J IP address).

47. On August 22, 2023, your affiant conducted surveillance at 120 E. 13th Avenue Columbus, Ohio 43201. Your affiant observed that the majority of the 24 mailboxes (four sets of six boxes) seemed to be more secure than they appeared to be on June 20, 2023,

when your affiant last observed them up close. However, in the six-box set that contains the mailbox for apartment K, apartment K's mailbox was the only box whose door was wide open, and there appeared to be some scratching in the metal where the lock mechanism on the door meets the box.

48. On August 24, 2023, at approximately 7:14 AM, the aforementioned Triumph Street Triple motorcycle bearing temporary Ohio registration 4W5186 was observed unattended in the parking lot of the Hollywood Casino in Columbus, Ohio. Regarding the motorcycle:

- a. Troopers with the Ohio State Highway Patrol (OSHP) responded to the Hollywood Casino parking lot and observed the motorcycle, and verified through queries of the temporary registration affixed to the motorcycle that it was registered to V3.
- b. OSHP contacted V3 by telephone and V3 stated he neither purchased nor registered the motorcycle.
- c. OSHP contacted the Triumph Cleveland dealership, informing them about what had transpired. The dealership stated they would be taking steps to recover the motorcycle.
- d. OSHP seized and impounded the motorcycle for further investigation.

49. On August 24, 2023, your affiant learned the following regarding YE:

- a. On August 23, 2023, at approximately 6:12 PM, YE was arrested inside the Hollywood Casino by Officers with the Columbus Police Department (CPD) on his active Franklin County, Ohio warrants for receiving stolen property and forgery. CPD transported YE and his property to the Franklin County Corrections Center (FCCC), located at 2460 Jackson Pike Columbus, Ohio 43223, where he was booked in, under the name Si YE and booking number 20230823073 and sheriff's office ("SO") number 0421413.
- b. As part of the intake process, CPD turned YE and property associated with YE over to the Franklin County Sheriff's Office (FCSO) personnel in the jail. The property consisted of a black and blue HJC motorcycle helmet strongly resembling the one he purchased at Iron Pony Motorsports on April 15, 2023, and a backpack containing items that were then placed in a property bag, as mentioned below.
- c. FCSO jail personnel placed all of YE's property previously contained in the backpack in a clear and white plastic property bag, which was signed by YE, attesting that the property inside belongs to him. The backpack and black and blue helmet were noted on the property bag, but as they were too big for the property bag, were kept separate with YE's jail clothing bag.

d. A booking photo was taken of YE, and that photo was affixed to the property bag. Your affiant recognizes the individual in the photo as YE.

50. On August 24, 2023, your affiant and other law enforcement officials executed a federal search warrant at 265 E. State Street Apartment 411 Columbus, Ohio 43215, where Jessica Rosco was present. Some of the items that were seized were:

- a. Identification documents issued by Florida and Illinois bearing the likeness and information of individuals other than YE, credit and debit cards in YE's name, and a debit card in the name of an individual other than YE.

51. On August 24, 2023, your affiant reviewed both victim OH|ID account information provided by the Ohio BMV and information provided by the Mayfield Heights Police Department regarding YE's Capital One checking account ending in x5741:

- a. On April 6, 2023, from IP address 24.52.91.178 (Hollywood Casino IP address), the following transactions were conducted:
 - o 7:57 PM – Capital One checking account was accessed online from an iPhone.
 - o 8:57 PM – OH|ID account (account number 76605769) for V1 was accessed online.
 - o 9:00 PM – OH|ID account (account number 75583550) for V4 was accessed online.
 - o 9:26 PM – Capital One checking account was accessed online, from an iPhone.
 - o 9:27 PM – Capital One checking account was accessed online, from an iPhone.
- b. On April 12, 2023, from IP address 24.52.91.178 (Hollywood Casino IP address), the following transactions were conducted:
 - o 2:50 PM – OH|ID account (account number 74085403) for V2 was accessed online.
 - o 3:34 PM – Capital One checking account was accessed online, from an iPhone.
 - o 3:36 PM – OH|ID account (account number 74085403) for V2 was accessed online.
- c. On April 13, 2023, from IP address 24.52.91.178 (Hollywood Casino IP address), the following transactions were conducted:

- 6:53 PM – Capital One checking account was accessed online, from an iPhone.
- 9:37 PM – OH|ID account (account number 74085403) for V2 was accessed online.
- 9:40 PM – OH|ID account (account number 75583550) for V4 was accessed online.
- 10:52 PM – Capital One checking account was accessed online, from an iPhone.

d. In your affiant's training and experience, there is reason to believe that YE used an iPhone at the Hollywood Casino on previous occasions in furtherance of his criminal activity.

52. On August 25, 2023, your affiant executed a federal search warrant at the FCCC, searching YE's inmate property bag (bag for S.O. number 0421413). Some of the items present in the property bag were YE's temporary Ohio driver's license (number ending in x4811), YE's Social Security card, YE's apartment key fob with "Borror" keychain tag, YE's Chinese passport, and two debit cards bearing YE's name. Some of the items seized from the property bag were a white iPhone, and two Triumph motorcycle keys.

53. On August 28, 2023, your affiant learned the following regarding YE's August 23, 2023 CPD arrest as it relates to his property:

- a. Ohio Casino Control Commission (OCCC) Investigators and Hollywood Casino security personnel became aware of YE's presence in the casino, and that he had an outstanding Franklin County, Ohio warrant. OCCC Investigators contacted CPD regarding YE's warrant.
- b. YE was seen on casino security cameras entering the casino at approximately 5:12 PM, wearing the aforementioned black leather jacket with button-snap epaulettes and grey hood, carrying a black backpack and black and blue motorcycle helmet in his hands as he entered.
- c. At approximately 5:15 PM, YE was seen on casino security cameras sitting down at a gaming table, placing the backpack and helmet on the seat next to him.
- d. YE was later seen getting up from the gaming table, leaving his backpack and helmet on the same seat, with the dealer and another player on the other side of the table being the only individuals present near the items.
- e. YE was then apprehended by a CPD Officers as he exited the restroom and escorted outside of the casino to a CPD cruiser.
- f. Security camera footage shows the two items remaining on the same seat, untouched until a casino security official came by, picked up the two items and

gave them to the pit boss, in the roped off-area behind the table, where they sat untouched.

- g. Shortly thereafter, another CPD officer and other casino personnel then came and obtained YE's backpack and helmet from the pit boss and brought them outside to the cruiser.
- h. When asked about the backpack and helmet, YE stated that they were not his, but given the security personnel's observations of YE regarding the property at the gaming table prior to going to the restroom, CPD opened the backpack and inventoried its contents, which included the aforementioned items implicitly attributable to YE.
 - i. The backpack, its contents, and the black and blue motorcycle helmet were brought with YE by CPD to the FCCC.
 - j. Per FCCC policy, property items that do not bear the name and/or likeness of the inmate are not accepted by FCCC and must be retained by the arresting agency.
- k. In a black wallet within YE's backpack, CPD discovered the following items not bearing YE's name/likeness:
 - o State of Ohio paper interim driver's license (number ending in x5680) with YE's facial photo, but in the name of an individual other than YE.
 - o Chime Visa debit card in the name of an individual other than YE.
 - o State of Ohio driver's license (number ending in x3918) with V2's name and likeness.
 - o Premier Bankcard credit card number x6761 in the name of V2.
 - o State of Ohio birth certificate (number ending in x8045) in the name of an individual other than YE.
 - o State of Ohio driver's license (number ending in x5680) with V3's name and likeness.
 - o State of Ohio temporary tag registration (number 4W5186) for the aforementioned 2024 Triumph Street Triple 765 R motorcycle, registered in V3's name.

54. On August 29, 2023, your affiant retrieved all of the aforementioned seven items from the CPD property room and seized them as evidence.

III. BACKGROUND REGARDING IDENTITY THEFT AND FINANCIAL CRIMES

55. Based upon work experience and training, as well as discussions with fellow law enforcement agents and officers, your affiant knows that:

- a. In recent history, data breaches of governmental entities and private business have compromised many individuals' personally identifiable information (PII) and made it available to others who would commit theft and fraud with it.
- b. Once an unauthorized individual obtains and assumes the identity of a victim, they are able to wreak financial havoc upon the victim, by opening up lines of credit, purchasing items, drastically lowering the victim's credit score, and generally taking away the victim's financial autonomy for years to come.
- c. Individuals who commit identity theft and financial crimes often have more than one victim and may use the identity of any one of or multiple victims at a time.
- d. Individuals who steal the identities of others often do so for financial gain, but also do so to obtain items of value for their own personal use. It is common for these individuals, to keep and maintain those items of value within their residence.
- e. It is common for individuals, including those involved in identity theft and financial crimes, to maintain within their residence, actual identification documents and/or photocopies of identification documents of their victims they obtained unlawfully, paper records issued by various state entities, to include Bureaus and Departments of Motor Vehicles (BMVs and DMVs), financial instruments and records for themselves and/or their victims to include credit cards, debit cards, financial statements, receipts, invoices, bank statements, bank records, and ATM receipts.
- f. Due to the increasing prevalence of electronic communications and storage, the aforementioned items can either be found in physical paper form or stored and accessible electronically via computer or other digital media devices.
- g. Due to the small size and frequent everyday use of digital media devices such as cellular telephones, it is very common for individuals, including those involved in identity theft and financial crimes, to carry these devices on their person.

IV. BACKGROUND REGARDING COMPUTERS AND THE INTERNET

56. Based upon work experience and training, as well as discussions with fellow law enforcement agents, officers, and analysts, your affiant knows that:

- a. Computers and other Internet-capable digital media devices such as cellular telephones and tablets have revolutionized many aspects of daily life, to include the way in which individuals communicate, and conduct transactions.

- b. The Internet is a worldwide network of computer systems operated by governmental entities, corporations, and universities. With a computer or other digital media device connected to the Internet, an individual user can make electronic contact with millions of other computer/other digital media device users around the world. Many individual computer/digital media device users obtain their access to the Internet through businesses known as Internet Service Providers (“ISPs”). ISPs provide their customers with access to the Internet using wired telecommunications lines, wireless signals commonly known as Wi-Fi, and/or cellular service, provide Internet e-mail accounts that allow users to communicate with other Internet users by sending and receiving electronic messages through the ISPs’ servers or cellular network, remotely store electronic files on their customers’ behalf, and may provide other services unique to each particular ISP. ISPs maintain records pertaining to the individuals or companies that have subscriber accounts with the ISP. Those records may include identifying and billing information, account access information in the form of log files, e-mail transaction information, posting information, account application information, Internet Protocol (IP) addresses and other information both in computer data format and in written record format.
- c. The IP is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range of 0-255, separated by periods (e.g., 121.56.97 .178). Every computer and mobile device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most ISPs control a range of IP addresses. When mobile devices connect to the Internet, they are assigned an IP address either by the residential/commercial Wi-Fi ISP or the cellular ISP. The IP address assignments are controlled by the respective ISP.
- d. These Internet-based communication structures are ideal for individuals conducting identity theft and financial crimes. Having both open as well as anonymous communication capability allows the user to locate others of similar inclination and still maintain their anonymity. Once contact has been established, it is then possible to send messages to other co-conspirators and victims alike. These communication links make worldwide contact as easy as calling next door. Additionally, these communications can be quick, relatively secure, and as anonymous as desired. All of these advantages are well known and are the foundation of transactions between perpetrators of identity theft and financial crimes.
- e. As is the case with most digital technology, communications by way of the Internet can be saved or stored on the computer/other digital media device used for these purposes. Storing this information can be intentional, i.e., by saving an e-mail as a file on the computer/other digital media device, or saving the location of one’s favorite websites in, for example, “bookmarked” files. Digital information can also be retained unintentionally, e.g., traces of the path of an

electronic communicate on may be automatically stored in many places, such as temporary files or ISP client software, among others. In addition to electronic communications, a computer/other digital media device user's Internet activity generally leave traces or "footprints" in the web cache and history files of the browser used. Such information is often maintained indefinitely until overwritten by other data.

V. CONCLUSION

57. Based on my knowledge, training and experience, that of other agents and officers with whom your affiant has conferred, and the facts set forth herein, there is probable cause to believe Siyuan YE has violated 18 U.S.C. § 1028(a)(7) and § 1341. Therefore, your affiant respectfully requests this court issue an arrest warrant for the above individual.

Further, your affiant sayeth naught.

JEFFREY R
LANDTHORN

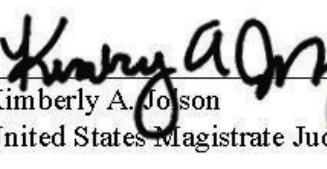
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Jeffrey Landthorn
Special Agent, Homeland Security Investigations

Subscribed and sworn to before me

August 30, 2023

This _____ day of _____, _____.



Kimberly A. Johnson
United States Magistrate Judge
